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# LATHAM & WATKINS LLP

October 5, 2011

## VIA ELECTRONIC FILING

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

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**Re: Request of Intelsat License LLC for Extension of STA, IBFS File Nos. SAT-STA-20110923-00185; SAT-MOD-20110420-00073; SAT-STA-20110314-00053; SAT-STA-20110727-00137 (Call Sign S2469)**

Dear Ms. Dortch:

Al Yah Satellite Communications Company PrJSC (“Yahsat”) comments on the above-referenced request filed on September 23, 2011 by Intelsat License LLC (“Intelsat”). Through its request, Intelsat seeks extension of special temporary authority (“STA”) previously granted to allow it to drift the Galaxy 26 satellite from 50.75° E.L. to 50.0° E.L., where it would operate on a permanent basis.<sup>1</sup>

Yahsat incorporates by reference its prior pleadings in this proceeding, and continues to oppose granting Intelsat the authority that it requests, on a temporary or permanent basis, until a clear coordination agreement is reached between the parties.<sup>2</sup> Furthermore, Yahsat requests that if the Commission does choose to extend Intelsat’s STA over Yahsat’s objections, the Commission clarify that Intelsat *must*: (i) operate on a non-harmful interference basis; *and*

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<sup>1</sup> See IBFS File No. SAT-STA-20110923-00185.

<sup>2</sup> See Comments of Al Yah Satellite Communications Company PrJSC (Jun. 6, 2011); Reply Comments of Al Yah Satellite Communications Company PrJSC (Jul. 1, 2011); Al Yah Satellite Communications Company Response to Surreply (Aug. 29, 2011) (filed in the above-referenced proceedings).

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(ii) operate at PFD levels below the hard limits established in Condition 6.b to Intelsat's existing STA (which are not merely coordination triggers).<sup>3</sup>

Please contact the undersigned should you have any questions.

Sincerely,

/s/ John P. Janka

John P. Janka  
Jarrett S. Taubman

*Counsel for Al Yah Satellite  
Communications Company PrJSC*

cc: Susah H. Crandall, Intelsat  
Jennifer D. Hindin, Wiley Rein LLP  
Joslyn Read, New Skies Satellites B.V.  
Karis A. Hastings, Hogan Lovells US LLP  
Robert Nelson, International Bureau  
Kathryn Medley, International Bureau  
Stephen Duall, International Bureau

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<sup>3</sup> See IBFS File No. SAT-STA-20110727-00137, Grant, Condition 6.b (“Intelsat must operate Galaxy 25 in accordance with the BSS PFD limits specified in the ITU Radio Regulations, Appendix 30, Annex 1, Sections 1(a) and 4, for protection of co-frequency BSS and terrestrial operators.”).